

Heinz Binder (SBN 87908)
Robert G. Harris (SBN 124678)
BINDER & MALTER, LLP
2775 Park Avenue
Santa Clara, CA 95050
Tel: (408) 295-1700
Fax: (408) 295-1531
Email: Heinz@bindermalter.com
Email: Rob@bindermalter.com

Attorneys for C.H. Reynolds Electric, Inc.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
PG&E CORPORATION

and

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case Nos. 19-30088 DM (Lead Case)
19-30089 DM

Chapter 11
Jointly Administered

Date: August 14, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
* All papers shall be filed in the Lead Case
No. 19-30088 DM.

Related Docket No.: 2896

**RESPONSE OF C.H. REYNOLDS ELECTRIC, INC. TO
DEBTORS' FIRST OMNIBUS REPORT AND OBJECTION TO CLAIMS ASSERTED
PURSUANT TO 11 U.S.C. § 503(b)(9)**

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1 C.H. Reynolds Electric, Inc. ("C.H. Reynolds") hereby responds as follows to the
2 DEBTORS' FIRST OMNIBUS REPORT AND OBJECTION TO CLAIMS ASSERTED
3 PURSUANT TO 11 U.S.C. § 503(b)(9):

4 1. C.H. Reynolds filed a timely claim [Claim no. 2639] in the amount of \$64,440.00
5 asserting priority under Bankruptcy Code section 503(b)(9) (the "Original Claim").

6 2. The Debtors object to the Original Claim on the following grounds: (1) Claim
7 reclassified as general unsecured claim because claim amount asserted includes amounts for services
8 and other non-goods; and (2) "Claim was incorrectly asserted against PG&E Corporation. The
9 claim has been reassigned to Pacific Gas and Electric Company".

10 3. C.H. Reynolds amended the Original Claim by filing its Amended Proof of 503(b)(9)
11 Claim (the "Amended Claim") on July 25, 2019, a true and correct copy of hic is attached hereto as
12 Exhibit "A", asserting priority for goods delivered only in the 20 days prior to the filing of the
13 above-captioned cases in the amount of \$43,313.39. All amounts asserted in the Amended Claim
14 were included in the Original Claim, timely asserted, and were simply not broken out separately.

15 4. C.H. Reynolds has no objection to disallowance of the portion of the Original Claim
16 relating to services and as to PG&E Corporation and asks that the Court allow the Amended Claim
17 for goods delivered as entitled to priority, as timely filed as relating back to the Original Claim and
18 as to debtor Pacific Gas and Electric Company.

19 Dated: July 30, 2019

BINDER & MALTER LLP

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21 /s/ Robert G. Harris
Robert G. Harris

22 Attorneys for C.H. Reynolds Electric, Inc.
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